

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**NATALIE ANDERSON, TIFFANY §
VASQUEZ AND BRIANA BALDERAS, §
§
Plaintiffs, §
§
v. §
§
RUIZ AND LOUVIN ENTERPRISES, §
LLC, ERIC LOUVIN, MEGAN LOUVIN, §
§
Defendants. §
§**

Case No. 5:23-cv-911-XR

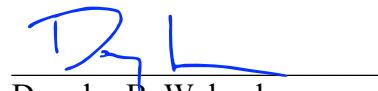
DECLARATION OF DOUGLAS B. WELMAKER

1. My name is Douglas B. Welmaker. I am over the age of 18 years, have personal knowledge of the matters set forth herein, and am competent to make this declaration. I make this declaration pursuant to the provisions of 28 U.S.C. § 1746.
2. I represent all three Plaintiffs in this FLSA lawsuit against Defendants.
3. On December 15, 2023, I served Interrogatories, Requests for Production, and Requests for Admission on all Defendants. On January 26, 2024, well after the deadline to object and file responses, I inquired of defense counsel when discovery responses might be received, and having received no response, I inquired again on January 29, 2024.
4. On January 29, 2024, Agostina Steier with Kennard Law responded, asking for an extension until February 29, 2024. That extension was granted, with the understanding that objections were waived.
5. On February 21, 2024, Agostina Steier requested another extension to March 15, 2024. I did not agree to this extension, but Defendants apparently took it anyway, as no responses or documents were produced on February 29, 2024. It is now March 25, 2024, and no responses to any of the discovery propounded upon Defendants has been received.
6. A true and correct copy of the correspondence between myself and Agostina Steier with Kennard Law is attached hereto as Attachment 1.

7. A true and correct copy of the Requests for Admissions served upon Defendants is attached hereto as Attachment 2.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 25, 2024


Douglas B. Welmaker